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## MEMO ENDORSED

August 20, 2020

**By ECF**

Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Michael Ramsaroop v. The Department of Education of the City of New York et al.  
20-CV-04947 (ER)

Dear Judge Ramos:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, attorney for defendant Department of Education of the City of New York ("DOE"), in the above-referenced matter. I write to respectfully request a 45-day extension of time, from August 25, 2020, to October 9, 2020, to respond to the complaint. This is the first request for an extension of time and it is being made with the consent of *pro se* plaintiff.

This extension is requested to provide this Office with sufficient time to prepare, review, and finalize an appropriate response to the complaint.

Furthermore, this Office is in the process of confirming service of the individual defendant, Shirley Miller ("Principal Miller"), who is an employee of the City of New York. As such, the additional time will allow this Office to determine proper service and representation of the individual defendant pursuant to General Municipal Law Section 50-k. Moreover, upon certifying or completing service, this Office would be able to interpose a single response on behalf of all City Defendants. Without appearing at this time on behalf of the individual defendant, this Office also asks that the Court extend the deadline, correspondingly, to October 9, 2020, for her respective response to the complaint.

As such, for the aforementioned reasons, I respectfully seek a 45-day extension of time to respond to the complaint.

I appreciate the Court's attention and consideration of this request.


Respectfully Submitted,  
/s/  
Morgan Webber-Ottey  
Assistant Corporation Counsel

cc (by ECF): Michael Ramsaroop  
*Pro Se Plaintiff*

Ariana Antoinette Donnellan  
*Attorney for Defendant the United Federation of Teachers*

Chumi Rachel Diamond  
*Attorney for Defendant the United Federation of Teachers*

The application is   X   granted  
   denied



Edgardo Ramos, U.S.D.J  
Dated: August 21, 2020  
New York, New York